# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

LORENZO BYRD, on behalf of TOMMY L. BYRD, an incompetent adult,

Plaintiff,

VS.

UNITED STATES OF AMERICA,

Defendant.

NO. 1:20-CV-03090-LMM

### AMENDED NOTICE OF DEPOSITION OF LORENZO BYRD

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant serves this notice, by and through counsel for Plaintiff Lorenzo Byrd, amending the date of the oral and videotaped deposition of the following witness at the time and place stated below for use in this action, including in any dispositive motions and at trial.

Witness: Lorenzo Byrd

Date: May 14, 2021

Time: 9:30 am EST

Location: CRC Salomon, Inc.

2201 Old Court Road Baltimore MD 21208 Court Reporter: Esquire and/or affiliate

Videographer: Esquire and/or affiliate

The deposition will continue from day to day until completed, with such breaks, as necessary. A request to produce documents permitted under Rule 30(b)(2) is attached as Exhibit A.

Respectfully submitted May 7, 2021.

KURT R. ERSKINE

Acting United States Attorney

/s/Trishanda L. Treadwell

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#### **Certificate of Service**

I certify that I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to attorneys of record.

May 7, 2021

/s/ Trishanda L. Treadwell
TRISHANDA L. TREADWELL
Assistant United States Attorney

#### **EXHIBIT A**

Under Fed. R. Civ. P. 34(b)(2), you are commanded to attend and testify at the above specified time and place; you are commanded to produce the below designated documents, electronically stored information, or tangible things in your possession, custody, or control. The following requests do not seek any communication to or from your legal counsel. Please produce a true and correct physical copy of the following at the deposition or before. This is not intended to duplicate documents that have already been produced in this case. This request is only intended to capture additional documents not yet produced that are responsive. All requests and terms used below should be read as having the same meaning that Plaintiff intended in his deposition notices.

- 1. Documents, emails, text messages, memoranda, telephone memos, notes, photographs, videos, or any other type of material concerning any facts related to this lawsuit.
- 2. Statements, affidavits, declarations, letters, or other documents you have authored or contributed to concerning this case.
- 3. Records, personal notes, calendars, diaries, phone logs and any other type of document (whether electronic, handwritten or otherwise) concerning any facts related to this lawsuit.